

EXHIBIT A

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF TA-NEHISI COATES'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

RESPONSE TO REQUEST NO. 2:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that some such communications are publicly accessible, are equally available to Defendants, or are already in the possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production No. 3.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged communications within his possession, custody, or control relating to this ACTION that are not equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 3:

All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING actual or potential claims against Meta, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 3:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request to the extent that the term “actual or potential claims against Meta” is overbroad and overly burdensome. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for

1 communications subject to the attorney-client privilege, work product doctrine, and/or any other
2 applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that
3 some such documents are publicly accessible, are equally available to Defendants, or are already in
4 their possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative,
5 in whole or in part, of Request for Production No. 2.

6 Subject to and without waiving the general and specific objections stated above, Plaintiff will
7 search for and produce relevant and responsive non-privileged communications within his possession,
8 custody, or control, relating to this ACTION that are not equally accessible to the Defendants in this
9 ACTION.

10 **REQUEST FOR PRODUCTION NO. 4:**

11 All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third
12 parties, on the other hand, CONCERNING actual or potential claims in connection with OTHER
13 GENERATIVE AI LITIGATION, including but not limited to interviews, statements to the press, and
14 discussions with other authors not a party to the ACTION.

15 **RESPONSE TO REQUEST NO. 4:**

16 In addition to and without waiving the general objections set forth above, Plaintiff objects to
17 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
18 Request to the extent that the term “actual or potential claims in connection with OTHER
19 GENERATIVE AI LITIGATION,” is overbroad and ambiguous. Plaintiff further objects to this
20 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
21 of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to
22 this Request to the extent that it calls for documents subject to the attorney-client privilege, work
23 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to
24 this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3.

25 Subject to and without waiving the general and specific objections stated above, Plaintiff will
26 search for and produce relevant and responsive non-privileged communications within his possession,
27 custody, or control regarding Plaintiff’s decision to be named Plaintiff in this Action that are not
28 equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 5:

All COMMUNICATIONS including YOU or individuals acting on YOUR behalf, relating to the ACTION, OTHER GENERATIVE AI LITIGATION or generative AI tools.

RESPONSE TO REQUEST NO. 5:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to the phrase “individuals acting on YOUR behalf” as vague and ambiguous. Plaintiff will only search for relevant material in his care, custody, or control. Plaintiff objects to this Request to the extent that the term “generative AI tools” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff responds OTHER GENERATIVE AI LITIGATION is not relevant to this ACTION and Plaintiff will meet and confer to narrow the scope of the Request.

REQUEST FOR PRODUCTION NO. 6:

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about generative AI.

RESPONSE TO REQUEST NO. 6:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature with respect to the terms “statements, opinions, and/or views.” Plaintiff objects to this Request to the extent that the term “generative AI” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product

1 Request to the extent that the term “YOU first became aware of” is vague and ambiguous. Plaintiff
2 further objects to this Request as unduly burdensome, not relevant to any claim or defense, and
3 disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.”
4 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
5 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.
6 Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for
7 Production No. 19.

8 Subject to and without waiving the general and specific objections stated above, Plaintiff will
9 search for and produce relevant and responsive non-privileged documents within his possession,
10 custody, or control relating to when and how Plaintiff first became aware of the alleged infringement of
11 Plaintiff’s ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language
12 models if they exist.

13 **REQUEST FOR PRODUCTION NO. 21:**

14 All DOCUMENTS CONCERNING the Discord chats and other COMMUNICATIONS
15 referenced in Paragraphs 55-62 of the First Consolidated Amended Complaint, including all referenced
16 COMMUNICATIONS, DOCUMENTS REFLECTING when and how YOU obtained such
17 COMMUNICATIONS, YOUR efforts to obtain such COMMUNICATIONS, and from whom YOU
18 obtained such COMMUNICATIONS.

19 **RESPONSE TO REQUEST NO. 21:**

20 In addition to and without waiving the general objections set forth above, Plaintiff objects to
21 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
22 Request to the extent that the term “obtained” is vague. Plaintiff further objects to this Request as
23 unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,
24 particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request on the
25 grounds that some such documents are publicly accessible, are equally available to Defendants, or are
26 already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls
27 for documents subject to the attorney-client privilege, work product doctrine, and/or any other
28 applicable privilege or protection from disclosure.

1 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 2 produce, upon receipt from EleutherAI, the Discord chat messages referenced in paragraphs 55–62 of
 3 the First Consolidated Amended Complaint.

4 **REQUEST FOR PRODUCTION NO. 22:**

5 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those on YOUR behalf, to
 6 enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who
 7 has allegedly infringed YOUR ASSERTED WORKS.

8 **RESPONSE TO REQUEST NO. 22:**

9 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 10 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 11 Request to the extent that the term “efforts” is vague and ambiguous. Plaintiff objects to this Request to
 12 the extent that the term “YOUR behalf” is ambiguous and overbroad. Plaintiff further objects to this
 13 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
 14 of the case. Plaintiff objects to this Request on the grounds that some such documents are publicly
 15 accessible, are equally available to Defendants, or are already in their possession, custody, or control.
 16 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
 17 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

18 Subject to and without waiving the general and specific objections stated above, Plaintiff refers
 19 the propounding party to *In Re OpenAI ChatGPT Litigation*, Lead Case No. 3:23-cv-03223-AMO.

20 **REQUEST FOR PRODUCTION NO. 23:**

21 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
 22 Meta’s alleged infringement of YOUR ASSERTED WORKS.

23 **RESPONSE TO REQUEST NO. 23:**

24 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 25 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 26 Request to the extent that the term “sustained injury” is vague. Plaintiff further objects to this Request
 27 as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
 28 case, particularly because the Request seeks “All DOCUMENTS.” Plaintiffs also object to the Request

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF JUNOT DÍAZ'S RESPONSES
AND OBJECTIONS TO DEFENDANT
META PLATFORMS, INC.'S FIRST SET
OF REQUESTS FOR PRODUCTION OF
DOCUMENTS AND THINGS**

RESPONSE TO REQUEST NO. 2:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that some such communications are publicly accessible, are equally available to Defendants, or are already in the possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production No. 3.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged communications within his possession, custody, or control relating to this ACTION that are not equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 3:

All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING actual or potential claims against Meta, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 3:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request to the extent that the term “actual or potential claims against Meta” is overbroad and overly burdensome. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for

1 communications subject to the attorney-client privilege, work product doctrine, and/or any other
 2 applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that
 3 some such documents are publicly accessible, are equally available to Defendants, or are already in
 4 their possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative,
 5 in whole or in part, of Request for Production No. 2.

6 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 7 search for and produce relevant and responsive non-privileged communications within his possession,
 8 custody, or control, relating to this ACTION that are not equally accessible to the Defendants in this
 9 ACTION.

10 **REQUEST FOR PRODUCTION NO. 4:**

11 All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third
 12 parties, on the other hand, CONCERNING actual or potential claims in connection with OTHER
 13 GENERATIVE AI LITIGATION, including but not limited to interviews, statements to the press, and
 14 discussions with other authors not a party to the ACTION.

15 **RESPONSE TO REQUEST NO. 4:**

16 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 17 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 18 Request to the extent that the term “actual or potential claims in connection with OTHER
 19 GENERATIVE AI LITIGATION,” is overbroad and ambiguous. Plaintiff further objects to this
 20 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
 21 of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to
 22 this Request to the extent that it calls for documents subject to the attorney-client privilege, work
 23 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to
 24 this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3.

25 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 26 search for and produce relevant and responsive non-privileged communications within his possession,
 27 custody, or control regarding Plaintiff’s decision to be named Plaintiff in this Action that are not
 28 equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 5:

All COMMUNICATIONS including YOU or individuals acting on YOUR behalf, relating to the ACTION, OTHER GENERATIVE AI LITIGATION or generative AI tools.

RESPONSE TO REQUEST NO. 5:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to the phrase “individuals acting on YOUR behalf” as vague and ambiguous. Plaintiff will only search for relevant material in his care, custody, or control. Plaintiff objects to this Request to the extent that the term “generative AI tools” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff responds OTHER GENERATIVE AI LITIGATION is not relevant to this ACTION and Plaintiff will meet and confer to narrow the scope of the Request.

REQUEST FOR PRODUCTION NO. 6:

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about generative AI.

RESPONSE TO REQUEST NO. 6:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature with respect to the terms “statements, opinions, and/or views.” Plaintiff objects to this Request to the extent that the term “generative AI” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product

Request to the extent that the term “YOU first became aware of” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production No. 19.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged documents within his possession, custody, or control relating to when and how Plaintiff first became aware of the alleged infringement of Plaintiff’s ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language models if they exist.

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS CONCERNING the Discord chats and other COMMUNICATIONS referenced in Paragraphs 55-62 of the First Consolidated Amended Complaint, including all referenced COMMUNICATIONS, DOCUMENTS REFLECTING when and how YOU obtained such COMMUNICATIONS, YOUR efforts to obtain such COMMUNICATIONS, and from whom YOU obtained such COMMUNICATIONS.

RESPONSE TO REQUEST NO. 21:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “obtained” is vague. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request on the grounds that some such documents are publicly accessible, are equally available to Defendants, or are already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

1 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 2 produce, upon receipt from EleutherAI, the Discord chat messages referenced in paragraphs 55–62 of
 3 the First Consolidated Amended Complaint.

4 **REQUEST FOR PRODUCTION NO. 22:**

5 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those on YOUR behalf, to
 6 enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who
 7 has allegedly infringed YOUR ASSERTED WORKS.

8 **RESPONSE TO REQUEST NO. 22:**

9 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 10 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 11 Request to the extent that the term “efforts” is vague and ambiguous. Plaintiff objects to this Request to
 12 the extent that the term “YOUR behalf” is ambiguous and overbroad. Plaintiff further objects to this
 13 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
 14 of the case. Plaintiff objects to this Request on the grounds that some such documents are publicly
 15 accessible, are equally available to Defendants, or are already in their possession, custody, or control.
 16 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
 17 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

18 Subject to and without waiving the general and specific objections stated above, Plaintiff refers
 19 the propounding party to *In Re OpenAI ChatGPT Litigation*, Lead Case No. 3:23-cv-03223-AMO.

20 **REQUEST FOR PRODUCTION NO. 23:**

21 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
 22 Meta’s alleged infringement of YOUR ASSERTED WORKS.

23 **RESPONSE TO REQUEST NO. 23:**

24 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 25 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 26 Request to the extent that the term “sustained injury” is vague. Plaintiff further objects to this Request
 27 as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
 28 case, particularly because the Request seeks “All DOCUMENTS.” Plaintiffs also object to the Request

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Plaintiffs and the Proposed Class*

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-06663

**PLAINTIFF CHRISTOPHER GOLDEN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

RESPONSE TO REQUEST NO. 2:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that some such communications are publicly accessible, are equally available to Defendant, or are already in the possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production No. 3.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged communications within his possession, custody, or control relating to this ACTION that are not equally accessible to the Defendant in this ACTION.

REQUEST FOR PRODUCTION NO. 3:

All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING actual or potential claims against Meta, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 3:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request to the extent that the term “actual or potential claims against Meta” is overbroad and overly burdensome. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for

1 communications subject to the attorney-client privilege, work product doctrine, and/or any other
2 applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that
3 some such documents are publicly accessible, are equally available to Defendant, or are already in their
4 possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in
5 whole or in part, of Request for Production No. 2.

6 Subject to and without waiving the general and specific objections stated above, Plaintiff will
7 search for and produce relevant and responsive non-privileged communications within his possession,
8 custody, or control, relating to this ACTION that are not equally accessible to the Defendant in this
9 ACTION.

10 **REQUEST FOR PRODUCTION NO. 4:**

11 All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third
12 parties, on the other hand, CONCERNING actual or potential claims in connection with OTHER
13 GENERATIVE AI LITIGATION, including but not limited to interviews, statements to the press, and
14 discussions with other authors not a party to the ACTION.

15 **RESPONSE TO REQUEST NO. 4:**

16 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
17 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
18 Request to the extent that the term “actual or potential claims in connection with OTHER
19 GENERATIVE AI LITIGATION,” is overbroad and ambiguous. Plaintiff further objects to this
20 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
21 of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to
22 this Request to the extent that it calls for documents subject to the attorney-client privilege, work
23 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects
24 to this Request to the extent that it is duplicative, in whole or in part, of Request for Production
25 Nos. 2, 3.

26 Subject to and without waiving the general and specific objections stated above, Plaintiff will
27 search for and produce relevant and responsive non-privileged communications within his possession,
28

1 custody, or control regarding Plaintiff's decision to be named Plaintiff in this Action that are not equally
2 accessible to the Defendant in this ACTION.

3 **REQUEST FOR PRODUCTION NO. 5:**

4 All COMMUNICATIONS including YOU or individuals acting on YOUR behalf, relating to
5 the ACTION, OTHER GENERATIVE AI LITIGATION or generative AI tools.

6 **RESPONSE TO REQUEST NO. 5:**

7 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
8 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to the
9 phrase "individuals acting on YOUR behalf" as vague and ambiguous. Plaintiff will only search for
10 relevant material in his care, custody, or control. Plaintiff objects to this Request to the extent that the
11 term "generative AI tools" is vague and ambiguous. Plaintiff further objects to this Request as unduly
12 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,
13 particularly because the Request seeks "All COMMUNICATIONS." Plaintiff objects to this Request
14 to the extent that it calls for communications subject to the attorney-client privilege, work product
15 doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this
16 Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, 4.

17 Subject to and without waiving the general and specific objections stated above, Plaintiff
18 responds OTHER GENERATIVE AI LITIGATION is not relevant to this ACTION and Plaintiff will
19 meet and confer to narrow the scope of the Request.

20 **REQUEST FOR PRODUCTION NO. 6:**

21 All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about
22 generative AI.

23 **RESPONSE TO REQUEST NO. 6:**

24 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
25 Request to the extent that it is vague, ambiguous, and overbroad in nature with respect to the terms
26 "statements, opinions, and/or views." Plaintiff objects to this Request to the extent that the term
27 "generative AI" is vague and ambiguous. Plaintiff further objects to this Request as unduly
28 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,

RESPONSE TO REQUEST NO. 20:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “YOU first became aware of” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production No. 19.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged documents within his possession, custody, or control relating to when and how Plaintiff first became aware of the alleged infringement of Plaintiff’s ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language models if they exist.

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS CONCERNING the Discord chats and other COMMUNICATIONS referenced in Paragraphs 55-62 of the First Consolidated Amended Complaint, including all referenced COMMUNICATIONS, DOCUMENTS REFLECTING when and how YOU obtained such COMMUNICATIONS, YOUR efforts to obtain such COMMUNICATIONS, and from whom YOU obtained such COMMUNICATIONS.

RESPONSE TO REQUEST NO. 21:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “obtained” is vague. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request on the grounds that some such documents are publicly accessible, are equally available to Defendant, or are

1 already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls
 2 for documents subject to the attorney-client privilege, work product doctrine, and/or any other
 3 applicable privilege or protection from disclosure.

4 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 5 produce, upon receipt from EleutherAI, the Discord chat messages referenced in paragraphs 55–62 of
 6 the First Consolidated Amended Complaint.

7 **REQUEST FOR PRODUCTION NO. 22:**

8 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those on YOUR behalf, to
 9 enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who
 10 has allegedly infringed YOUR ASSERTED WORKS.

11 **RESPONSE TO REQUEST NO. 22:**

12 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
 13 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 14 Request to the extent that the term “efforts” is vague and ambiguous. Plaintiff objects to this Request to
 15 the extent that the term “YOUR behalf” is ambiguous and overbroad. Plaintiff further objects to this
 16 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
 17 of the case. Plaintiff objects to this Request on the grounds that some such documents are publicly
 18 accessible, are equally available to Defendant, or are already in their possession, custody, or control.
 19 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
 20 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

21 Subject to and without waiving the general and specific objections stated above, Plaintiff refers
 22 the propounding party to *In Re OpenAI ChatGPT Litigation*, Lead Case No. 3:23-cv-03223-AMO.

23 **REQUEST FOR PRODUCTION NO. 23:**

24 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
 25 Meta’s alleged infringement of YOUR ASSERTED WORKS.

26 **RESPONSE TO REQUEST NO. 23:**

27 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
 28 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this

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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF ANDREW SEAN GREER'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

RESPONSE TO REQUEST NO. 2:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that some such communications are publicly accessible, are equally available to Defendants, or are already in the possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production No. 3.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged communications within his possession, custody, or control relating to this ACTION that are not equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 3:

All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING actual or potential claims against Meta, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 3:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request to the extent that the term “actual or potential claims against Meta” is overbroad and overly burdensome. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for

1 communications subject to the attorney-client privilege, work product doctrine, and/or any other
2 applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that
3 some such documents are publicly accessible, are equally available to Defendants, or are already in
4 their possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative,
5 in whole or in part, of Request for Production No. 2.

6 Subject to and without waiving the general and specific objections stated above, Plaintiff will
7 search for and produce relevant and responsive non-privileged communications within his possession,
8 custody, or control, relating to this ACTION that are not equally accessible to the Defendants in this
9 ACTION.

10 **REQUEST FOR PRODUCTION NO. 4:**

11 All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third
12 parties, on the other hand, CONCERNING actual or potential claims in connection with OTHER
13 GENERATIVE AI LITIGATION, including but not limited to interviews, statements to the press, and
14 discussions with other authors not a party to the ACTION.

15 **RESPONSE TO REQUEST NO. 4:**

16 In addition to and without waiving the general objections set forth above, Plaintiff objects to
17 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
18 Request to the extent that the term “actual or potential claims in connection with OTHER
19 GENERATIVE AI LITIGATION,” is overbroad and ambiguous. Plaintiff further objects to this
20 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
21 of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to
22 this Request to the extent that it calls for documents subject to the attorney-client privilege, work
23 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to
24 this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3.

25 Subject to and without waiving the general and specific objections stated above, Plaintiff will
26 search for and produce relevant and responsive non-privileged communications within his possession,
27 custody, or control regarding Plaintiff’s decision to be named Plaintiff in this Action that are not
28 equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 5:

All COMMUNICATIONS including YOU or individuals acting on YOUR behalf, relating to the ACTION, OTHER GENERATIVE AI LITIGATION or generative AI tools.

RESPONSE TO REQUEST NO. 5:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to the phrase “individuals acting on YOUR behalf” as vague and ambiguous. Plaintiff will only search for relevant material in his care, custody, or control. Plaintiff objects to this Request to the extent that the term “generative AI tools” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff responds OTHER GENERATIVE AI LITIGATION is not relevant to this ACTION and Plaintiff will meet and confer to narrow the scope of the Request.

REQUEST FOR PRODUCTION NO. 6:

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about generative AI.

RESPONSE TO REQUEST NO. 6:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature with respect to the terms “statements, opinions, and/or views.” Plaintiff objects to this Request to the extent that the term “generative AI” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product

1 Request to the extent that the term “YOU first became aware of” is vague and ambiguous. Plaintiff
2 further objects to this Request as unduly burdensome, not relevant to any claim or defense, and
3 disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.”
4 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
5 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.
6 Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for
7 Production No. 19.

8 Subject to and without waiving the general and specific objections stated above, Plaintiff will
9 search for and produce relevant and responsive non-privileged documents within his possession,
10 custody, or control relating to when and how Plaintiff first became aware of the alleged infringement of
11 Plaintiff’s ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language
12 models if they exist.

13 **REQUEST FOR PRODUCTION NO. 21:**

14 All DOCUMENTS CONCERNING the Discord chats and other COMMUNICATIONS
15 referenced in Paragraphs 55-62 of the First Consolidated Amended Complaint, including all referenced
16 COMMUNICATIONS, DOCUMENTS REFLECTING when and how YOU obtained such
17 COMMUNICATIONS, YOUR efforts to obtain such COMMUNICATIONS, and from whom YOU
18 obtained such COMMUNICATIONS.

19 **RESPONSE TO REQUEST NO. 21:**

20 In addition to and without waiving the general objections set forth above, Plaintiff objects to
21 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
22 Request to the extent that the term “obtained” is vague. Plaintiff further objects to this Request as
23 unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,
24 particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request on the
25 grounds that some such documents are publicly accessible, are equally available to Defendants, or are
26 already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls
27 for documents subject to the attorney-client privilege, work product doctrine, and/or any other
28 applicable privilege or protection from disclosure.

1 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 2 produce, upon receipt from EleutherAI, the Discord chat messages referenced in paragraphs 55–62 of
 3 the First Consolidated Amended Complaint.

4 **REQUEST FOR PRODUCTION NO. 22:**

5 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those on YOUR behalf, to
 6 enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who
 7 has allegedly infringed YOUR ASSERTED WORKS.

8 **RESPONSE TO REQUEST NO. 22:**

9 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 10 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 11 Request to the extent that the term “efforts” is vague and ambiguous. Plaintiff objects to this Request to
 12 the extent that the term “YOUR behalf” is ambiguous and overbroad. Plaintiff further objects to this
 13 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
 14 of the case. Plaintiff objects to this Request on the grounds that some such documents are publicly
 15 accessible, are equally available to Defendants, or are already in their possession, custody, or control.
 16 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
 17 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

18 Subject to and without waiving the general and specific objections stated above, Plaintiff refers
 19 the propounding party to *In Re OpenAI ChatGPT Litigation*, Lead Case No. 3:23-cv-03223-AMO.

20 **REQUEST FOR PRODUCTION NO. 23:**

21 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
 22 Meta’s alleged infringement of YOUR ASSERTED WORKS.

23 **RESPONSE TO REQUEST NO. 23:**

24 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 25 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 26 Request to the extent that the term “sustained injury” is vague. Plaintiff further objects to this Request
 27 as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
 28 case, particularly because the Request seeks “All DOCUMENTS.” Plaintiffs also object to the Request

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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF DAVID HENRY HWANG'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

RESPONSE TO REQUEST NO. 2:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that some such communications are publicly accessible, are equally available to Defendants, or are already in the possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production No. 3.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged communications within his possession, custody, or control relating to this ACTION that are not equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 3:

All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING actual or potential claims against Meta, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 3:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request to the extent that the term “actual or potential claims against Meta” is overbroad and overly burdensome. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for

1 communications subject to the attorney-client privilege, work product doctrine, and/or any other
2 applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that
3 some such documents are publicly accessible, are equally available to Defendants, or are already in
4 their possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative,
5 in whole or in part, of Request for Production No. 2.

6 Subject to and without waiving the general and specific objections stated above, Plaintiff will
7 search for and produce relevant and responsive non-privileged communications within his possession,
8 custody, or control, relating to this ACTION that are not equally accessible to the Defendants in this
9 ACTION.

10 **REQUEST FOR PRODUCTION NO. 4:**

11 All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third
12 parties, on the other hand, CONCERNING actual or potential claims in connection with OTHER
13 GENERATIVE AI LITIGATION, including but not limited to interviews, statements to the press, and
14 discussions with other authors not a party to the ACTION.

15 **RESPONSE TO REQUEST NO. 4:**

16 In addition to and without waiving the general objections set forth above, Plaintiff objects to
17 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
18 Request to the extent that the term “actual or potential claims in connection with OTHER
19 GENERATIVE AI LITIGATION,” is overbroad and ambiguous. Plaintiff further objects to this
20 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
21 of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to
22 this Request to the extent that it calls for documents subject to the attorney-client privilege, work
23 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to
24 this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3.

25 Subject to and without waiving the general and specific objections stated above, Plaintiff will
26 search for and produce relevant and responsive non-privileged communications within his possession,
27 custody, or control regarding Plaintiff’s decision to be named Plaintiff in this Action that are not
28 equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 5:

All COMMUNICATIONS including YOU or individuals acting on YOUR behalf, relating to the ACTION, OTHER GENERATIVE AI LITIGATION or generative AI tools.

RESPONSE TO REQUEST NO. 5:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to the phrase “individuals acting on YOUR behalf” as vague and ambiguous. Plaintiff will only search for relevant material in his care, custody, or control. Plaintiff objects to this Request to the extent that the term “generative AI tools” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff responds OTHER GENERATIVE AI LITIGATION is not relevant to this ACTION and Plaintiff will meet and confer to narrow the scope of the Request.

REQUEST FOR PRODUCTION NO. 6:

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about generative AI.

RESPONSE TO REQUEST NO. 6:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature with respect to the terms “statements, opinions, and/or views.” Plaintiff objects to this Request to the extent that the term “generative AI” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product

1 Request to the extent that the term “YOU first became aware of” is vague and ambiguous. Plaintiff
2 further objects to this Request as unduly burdensome, not relevant to any claim or defense, and
3 disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.”
4 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
5 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.
6 Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for
7 Production No. 19.

8 Subject to and without waiving the general and specific objections stated above, Plaintiff will
9 search for and produce relevant and responsive non-privileged documents within his possession,
10 custody, or control relating to when and how Plaintiff first became aware of the alleged infringement of
11 Plaintiff’s ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language
12 models if they exist.

13 **REQUEST FOR PRODUCTION NO. 21:**

14 All DOCUMENTS CONCERNING the Discord chats and other COMMUNICATIONS
15 referenced in Paragraphs 55-62 of the First Consolidated Amended Complaint, including all referenced
16 COMMUNICATIONS, DOCUMENTS REFLECTING when and how YOU obtained such
17 COMMUNICATIONS, YOUR efforts to obtain such COMMUNICATIONS, and from whom YOU
18 obtained such COMMUNICATIONS.

19 **RESPONSE TO REQUEST NO. 21:**

20 In addition to and without waiving the general objections set forth above, Plaintiff objects to
21 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
22 Request to the extent that the term “obtained” is vague. Plaintiff further objects to this Request as
23 unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,
24 particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request on the
25 grounds that some such documents are publicly accessible, are equally available to Defendants, or are
26 already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls
27 for documents subject to the attorney-client privilege, work product doctrine, and/or any other
28 applicable privilege or protection from disclosure.

1 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 2 produce, upon receipt from EleutherAI, the Discord chat messages referenced in paragraphs 55–62 of
 3 the First Consolidated Amended Complaint.

4 **REQUEST FOR PRODUCTION NO. 22:**

5 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those on YOUR behalf, to
 6 enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who
 7 has allegedly infringed YOUR ASSERTED WORKS.

8 **RESPONSE TO REQUEST NO. 22:**

9 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 10 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 11 Request to the extent that the term “efforts” is vague and ambiguous. Plaintiff objects to this Request to
 12 the extent that the term “YOUR behalf” is ambiguous and overbroad. Plaintiff further objects to this
 13 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
 14 of the case. Plaintiff objects to this Request on the grounds that some such documents are publicly
 15 accessible, are equally available to Defendants, or are already in their possession, custody, or control.
 16 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
 17 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

18 Subject to and without waiving the general and specific objections stated above, Plaintiff refers
 19 the propounding party to *In Re OpenAI ChatGPT Litigation*, Lead Case No. 3:23-cv-03223-AMO.

20 **REQUEST FOR PRODUCTION NO. 23:**

21 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
 22 Meta’s alleged infringement of YOUR ASSERTED WORKS.

23 **RESPONSE TO REQUEST NO. 23:**

24 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 25 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 26 Request to the extent that the term “sustained injury” is vague. Plaintiff further objects to this Request
 27 as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
 28 case, particularly because the Request seeks “All DOCUMENTS.” Plaintiffs also object to the Request

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[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-06663

**PLAINTIFF RICHARD KADREY'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

RESPONSE TO REQUEST NO. 2:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that some such communications are publicly accessible, are equally available to Defendant, or are already in the possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request For Production No. 3.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged communications within his possession, custody, or control relating to this ACTION that are not equally accessible to the Defendant in this ACTION.

REQUEST FOR PRODUCTION NO. 3:

All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING actual or potential claims against Meta, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 3:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request to the extent that the term “actual or potential claims against Meta” is overbroad and overly burdensome. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for

1 communications subject to the attorney-client privilege, work product doctrine, and/or any other
2 applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that
3 some such documents are publicly accessible, are equally available to Defendant, or are already in their
4 possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in
5 whole or in part, of Request For Production No. 2.

6 Subject to and without waiving the general and specific objections stated above, Plaintiff will
7 search for and produce relevant and responsive non-privileged communications within his possession,
8 custody, or control, relating to this ACTION that are not equally accessible to the Defendant in this
9 ACTION.

10 **REQUEST FOR PRODUCTION NO. 4:**

11 All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third
12 parties, on the other hand, CONCERNING actual or potential claims in connection with OTHER
13 GENERATIVE AI LITIGATION, including but not limited to interviews, statements to the press, and
14 discussions with other authors not a party to the ACTION.

15 **RESPONSE TO REQUEST NO. 4:**

16 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
17 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
18 Request to the extent that the term “actual or potential claims in connection with OTHER
19 GENERATIVE AI LITIGATION,” is overbroad and ambiguous. Plaintiff further objects to this
20 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
21 of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to
22 this Request to the extent that it calls for documents subject to the attorney-client privilege, work
23 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects
24 to this Request to the extent that it is duplicative, in whole or in part, of Request For Production
25 Nos. 2, 3.

26 Subject to and without waiving the general and specific objections stated above, Plaintiff will
27 search for and produce relevant and responsive non-privileged communications within his possession,
28

1 custody, or control regarding Plaintiff's decision to be named Plaintiff in this Action that are not equally
2 accessible to the Defendant in this ACTION.

3 **REQUEST FOR PRODUCTION NO. 5:**

4 All COMMUNICATIONS including YOU or individuals acting on YOUR behalf, relating to
5 the ACTION, OTHER GENERATIVE AI LITIGATION or generative AI tools.

6 **RESPONSE TO REQUEST NO. 5:**

7 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
8 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to the
9 phrase "individuals acting on YOUR behalf" as vague and ambiguous. Plaintiff will only search for
10 relevant material in his care, custody, or control. Plaintiff objects to this Request to the extent that the
11 term "generative AI tools" is vague and ambiguous. Plaintiff further objects to this Request as unduly
12 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,
13 particularly because the Request seeks "All COMMUNICATIONS." Plaintiff objects to this Request
14 to the extent that it calls for communications subject to the attorney-client privilege, work product
15 doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this
16 Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, 4.

17 Subject to and without waiving the general and specific objections stated above, Plaintiff
18 responds OTHER GENERATIVE AI LITIGATION is not relevant to this ACTION and Plaintiff will
19 meet and confer to narrow the scope of the Request.

20 **REQUEST FOR PRODUCTION NO. 6:**

21 All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about
22 generative AI.

23 **RESPONSE TO REQUEST NO. 6:**

24 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
25 Request to the extent that it is vague, ambiguous, and overbroad in nature with respect the terms
26 "statements, opinions, and/or views." Plaintiff objects to this Request to the extent that the term
27 "generative AI" is vague and ambiguous. Plaintiff further objects to this Request as unduly
28 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,

REQUEST FOR PRODUCTION NO. 20:

All DOCUMENTS REFLECTING when and how YOU first became aware of the alleged infringement of YOUR ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language models.

RESPONSE TO REQUEST NO. 20:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “YOU first became aware of” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request For Production No. 19.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged documents within his possession, custody, or control relating to when and how Plaintiff first became aware of the alleged infringement of Plaintiff’s ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language models if they exist.

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS CONCERNING the Discord chats and other COMMUNICATIONS referenced in Paragraphs 55-62 of the First Consolidated Amended Complaint, including all referenced COMMUNICATIONS, DOCUMENTS REFLECTING when and how YOU obtained such COMMUNICATIONS, YOUR efforts to obtain such COMMUNICATIONS, and from whom YOU obtained such COMMUNICATIONS.

RESPONSE TO REQUEST NO. 21:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this

Request to the extent that the term “obtained” is vague. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request on the grounds that some such documents are publicly accessible, are equally available to Defendant, or are already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Subject to and without waiving the general and specific objections stated above, Plaintiff will produce, upon receipt from EleutherAI, the Discord chat messages referenced in paragraphs 55–62 of the First Consolidated Amended Complaint.

REQUEST FOR PRODUCTION NO. 22:

DOCUMENTS sufficient to show YOUR efforts, or the efforts by those on YOUR behalf, to enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who has allegedly infringed YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 22:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “efforts” is vague and ambiguous. Plaintiff objects to this Request to the extent that the term “YOUR behalf” is ambiguous and overbroad. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this Request on the grounds that some such documents are publicly accessible, are equally available to Defendant, or are already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Subject to and without waiving the general and specific objections stated above, Plaintiff refers the propounding party to *In Re OpenAI ChatGPT Litigation*, Lead Case No. 3:23-cv-03223-AMO.

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Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Travis Manfredi (State Bar No. 281779)
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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF MATTHEW KLAM'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

Lead Case No. 3:23-cv-03417-VC

PLAINTIFF MATTHEW KLAM'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

1 as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
2 case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to
3 this Request to the extent that it calls for communications subject to the attorney-client privilege, work
4 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to
5 this Request on the grounds that some such communications are publicly accessible, are equally
6 available to Defendants, or are already in the possession, custody, or control. Plaintiff objects to this
7 Request to the extent that it is duplicative, in whole or in part, of Request For Production No. 3.

8 Subject to and without waiving the general and specific objections stated above, Plaintiff will
9 search for and produce relevant and responsive non-privileged communications within his possession,
10 custody, or control relating to this ACTION that are not equally accessible to the Defendants in this
11 ACTION.

12 **REQUEST FOR PRODUCTION NO. 3:**

13 All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third
14 parties, on the other hand, CONCERNING actual or potential claims against Meta, including but not
15 limited to interviews, statements to the press, and discussions with other authors not a party to the
16 ACTION.

17 **RESPONSE TO REQUEST NO. 3:**

18 In addition to and without waiving the general objections set forth above, Plaintiff objects to
19 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
20 Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request
21 to the extent that the term “actual or potential claims against Meta” is overbroad and overly
22 burdensome. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or
23 defense, and disproportionate to the needs of the case, particularly because the Request seeks “All
24 COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for
25 communications subject to the attorney-client privilege, work product doctrine, and/or any other
26 applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that
27 some such documents are publicly accessible, are equally available to Defendants, or are already in
28

1 their possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative,
2 in whole or in part, of Request For Production No. 2.

3 Subject to and without waiving the general and specific objections stated above, Plaintiff will
4 search for and produce relevant and responsive non-privileged communications within his possession,
5 custody, or control, relating to this ACTION that are not equally accessible to the Defendants in this
6 ACTION.

7 **REQUEST FOR PRODUCTION NO. 4:**

8 All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third
9 parties, on the other hand, CONCERNING actual or potential claims in connection with OTHER
10 GENERATIVE AI LITIGATION, including but not limited to interviews, statements to the press, and
11 discussions with other authors not a party to the ACTION.

12 **RESPONSE TO REQUEST NO. 4:**

13 In addition to and without waiving the general objections set forth above, Plaintiff objects to
14 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
15 Request to the extent that the term “actual or potential claims in connection with OTHER
16 GENERATIVE AI LITIGATION,” is overbroad and ambiguous. Plaintiff further objects to this
17 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
18 of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to
19 this Request to the extent that it calls for documents subject to the attorney-client privilege, work
20 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to
21 this Request to the extent that it is duplicative, in whole or in part, of Request For Production Nos. 2, 3.

22 Subject to and without waiving the general and specific objections stated above, Plaintiff will
23 search for and produce relevant and responsive non-privileged communications within his possession,
24 custody, or control regarding Plaintiff’s decision to be named Plaintiff in this Action that are not
25 equally accessible to the Defendants in this ACTION.

26 **REQUEST FOR PRODUCTION NO. 5:**

27 All COMMUNICATIONS including YOU or individuals acting on YOUR behalf, relating to
28 the ACTION, OTHER GENERATIVE AI LITIGATION or generative AI tools.

RESPONSE TO REQUEST NO. 5:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to the phrase “individuals acting on YOUR behalf” as vague and ambiguous. Plaintiff will only search for relevant material in his care, custody, or control. Plaintiff objects to this Request to the extent that the term “generative AI tools” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request For Production Nos. 2, 3, 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff responds OTHER GENERATIVE AI LITIGATION is not relevant to this ACTION and Plaintiff will meet and confer to narrow the scope of the Request.

REQUEST FOR PRODUCTION NO. 6:

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about generative AI.

RESPONSE TO REQUEST NO. 6:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature with respect the terms “statements, opinions, and/or views.” Plaintiff objects to this Request to the extent that the term “generative AI” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request For Production Nos. 2, 3, 4, 5.

Request to the extent that the term “YOU first became aware of” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request For Production No. 19.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged documents within his possession, custody, or control relating to when and how Plaintiff first became aware of the alleged infringement of Plaintiff’s ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language models if they exist.

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS CONCERNING the Discord chats and other COMMUNICATIONS referenced in Paragraphs 55-62 of the First Consolidated Amended Complaint, including all referenced COMMUNICATIONS, DOCUMENTS REFLECTING when and how YOU obtained such COMMUNICATIONS, YOUR efforts to obtain such COMMUNICATIONS, and from whom YOU obtained such COMMUNICATIONS.

RESPONSE TO REQUEST NO. 21:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “obtained” is vague. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request on the grounds that some such documents are publicly accessible, are equally available to Defendants, or are already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

1 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 2 produce, upon receipt from EleutherAI, the Discord chat messages referenced in paragraphs 55–62 of
 3 the First Consolidated Amended Complaint.

4 **REQUEST FOR PRODUCTION NO. 22:**

5 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those on YOUR behalf, to
 6 enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who
 7 has allegedly infringed YOUR ASSERTED WORKS.

8 **RESPONSE TO REQUEST NO. 22:**

9 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 10 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 11 Request to the extent that the term “efforts” is vague and ambiguous. Plaintiff objects to this Request to
 12 the extent that the term “YOUR behalf” is ambiguous and overbroad. Plaintiff further objects to this
 13 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
 14 of the case. Plaintiff objects to this Request on the grounds that some such documents are publicly
 15 accessible, are equally available to Defendants, or are already in their possession, custody, or control.
 16 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
 17 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

18 Subject to and without waiving the general and specific objections stated above, Plaintiff refers
 19 the propounding party to *In Re OpenAI ChatGPT Litigation*, Lead Case No. 3:23-cv-03223-AMO.

20 **REQUEST FOR PRODUCTION NO. 23:**

21 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
 22 Meta’s alleged infringement of YOUR ASSERTED WORKS.

23 **RESPONSE TO REQUEST NO. 23:**

24 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 25 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 26 Request to the extent that the term “sustained injury” is vague. Plaintiff further objects to this Request
 27 as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
 28 case, particularly because the Request seeks “All DOCUMENTS.” Plaintiffs also object to the Request

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Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Travis Manfredi (State Bar No. 281779)
Holden Benon (State Bar No. 325847)
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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF LAURA LIPPMAN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

RESPONSE TO REQUEST NO. 2:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that some such communications are publicly accessible, are equally available to Defendants, or are already in the possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request For Production No. 3.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged communications within her possession, custody, or control relating to this ACTION that are not equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 3:

All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING actual or potential claims against Meta, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 3:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request to the extent that the term “actual or potential claims against Meta” is overbroad and overly burdensome. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for

1 communications subject to the attorney-client privilege, work product doctrine, and/or any other
2 applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that
3 some such documents are publicly accessible, are equally available to Defendants, or are already in
4 their possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative,
5 in whole or in part, of Request For Production No. 2.

6 Subject to and without waiving the general and specific objections stated above, Plaintiff will
7 search for and produce relevant and responsive non-privileged communications within her possession,
8 custody, or control, relating to this ACTION that are not equally accessible to the Defendants in this
9 ACTION.

10 **REQUEST FOR PRODUCTION NO. 4:**

11 All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third
12 parties, on the other hand, CONCERNING actual or potential claims in connection with OTHER
13 GENERATIVE AI LITIGATION, including but not limited to interviews, statements to the press, and
14 discussions with other authors not a party to the ACTION.

15 **RESPONSE TO REQUEST NO. 4:**

16 In addition to and without waiving the general objections set forth above, Plaintiff objects to
17 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
18 Request to the extent that the term “actual or potential claims in connection with OTHER
19 GENERATIVE AI LITIGATION,” is overbroad and ambiguous. Plaintiff further objects to this
20 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
21 of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to
22 this Request to the extent that it calls for documents subject to the attorney-client privilege, work
23 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to
24 this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3.

25 Subject to and without waiving the general and specific objections stated above, Plaintiff will
26 search for and produce relevant and responsive non-privileged communications within her possession,
27 custody, or control regarding Plaintiff’s decision to be named Plaintiff in this Action that are not
28 equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 5:

All COMMUNICATIONS including YOU or individuals acting on YOUR behalf, relating to the ACTION, OTHER GENERATIVE AI LITIGATION or generative AI tools.

RESPONSE TO REQUEST NO. 5:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to the phrase “individuals acting on YOUR behalf” as vague and ambiguous. Plaintiff will only search for relevant material in his care, custody, or control. Plaintiff objects to this Request to the extent that the term “generative AI tools” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff responds OTHER GENERATIVE AI LITIGATION is not relevant to this ACTION and Plaintiff will meet and confer to narrow the scope of the Request.

REQUEST FOR PRODUCTION NO. 6:

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about generative AI.

RESPONSE TO REQUEST NO. 6:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature with respect the terms “statements, opinions, and/or views.” Plaintiff objects to this Request to the extent that the term “generative AI” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product

1 Request to the extent that the term “YOU first became aware of” is vague and ambiguous. Plaintiff
2 further objects to this Request as unduly burdensome, not relevant to any claim or defense, and
3 disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.”
4 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
5 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.
6 Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request For
7 Production No. 19.

8 Subject to and without waiving the general and specific objections stated above, Plaintiff will
9 search for and produce relevant and responsive non-privileged documents within her possession,
10 custody, or control relating to when and how Plaintiff first became aware of the alleged infringement of
11 Plaintiff’s ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language
12 models if they exist.

13 **REQUEST FOR PRODUCTION NO. 21:**

14 All DOCUMENTS CONCERNING the Discord chats and other COMMUNICATIONS
15 referenced in Paragraphs 55-62 of the First Consolidated Amended Complaint, including all referenced
16 COMMUNICATIONS, DOCUMENTS REFLECTING when and how YOU obtained such
17 COMMUNICATIONS, YOUR efforts to obtain such COMMUNICATIONS, and from whom YOU
18 obtained such COMMUNICATIONS.

19 **RESPONSE TO REQUEST NO. 21:**

20 In addition to and without waiving the general objections set forth above, Plaintiff objects to
21 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
22 Request to the extent that the term “obtained” is vague. Plaintiff further objects to this Request as
23 unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,
24 particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request on the
25 grounds that some such documents are publicly accessible, are equally available to Defendants, or are
26 already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls
27 for documents subject to the attorney-client privilege, work product doctrine, and/or any other
28 applicable privilege or protection from disclosure.

1 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 2 produce, upon receipt from EleutherAI, the Discord chat messages referenced in paragraphs 55–62 of
 3 the First Consolidated Amended Complaint.

4 **REQUEST FOR PRODUCTION NO. 22:**

5 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those on YOUR behalf, to
 6 enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who
 7 has allegedly infringed YOUR ASSERTED WORKS.

8 **RESPONSE TO REQUEST NO. 22:**

9 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 10 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 11 Request to the extent that the term “efforts” is vague and ambiguous. Plaintiff objects to this Request to
 12 the extent that the term “YOUR behalf” is ambiguous and overbroad. Plaintiff further objects to this
 13 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
 14 of the case. Plaintiff objects to this Request on the grounds that some such documents are publicly
 15 accessible, are equally available to Defendants, or are already in their possession, custody, or control.
 16 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
 17 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

18 Subject to and without waiving the general and specific objections stated above, Plaintiff refers
 19 the propounding party to *In Re OpenAI ChatGPT Litigation*, Lead Case No. 3:23-cv-03223-AMO.

20 **REQUEST FOR PRODUCTION NO. 23:**

21 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
 22 Meta’s alleged infringement of YOUR ASSERTED WORKS.

23 **RESPONSE TO REQUEST NO. 23:**

24 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 25 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 26 Request to the extent that the term “sustained injury” is vague. Plaintiff further objects to this Request
 27 as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
 28 case, particularly because the Request seeks “All DOCUMENTS.” Plaintiffs also object to the Request

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Cadio Zirpoli (State Bar No. 179108)
Christopher K. L. Young (State Bar No. 318371)
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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-06663

**PLAINTIFF SARAH SILVERMAN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

RESPONSE TO REQUEST NO. 2:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that some such communications are publicly accessible, are equally available to Defendant, or are already in the possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production No. 3.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged communications within her possession, custody, or control relating to this ACTION that are not equally accessible to the Defendant in this ACTION.

REQUEST FOR PRODUCTION NO. 3:

All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING actual or potential claims against Meta, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 3:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request to the extent that the term “actual or potential claims against Meta” is overbroad and overly burdensome. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for

1 communications subject to the attorney-client privilege, work product doctrine, and/or any other
2 applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that
3 some such documents are publicly accessible, are equally available to Defendant, or are already in their
4 possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in
5 whole or in part, of Request for Production No. 2.

6 Subject to and without waiving the general and specific objections stated above, Plaintiff will
7 search for and produce relevant and responsive non-privileged communications within her possession,
8 custody, or control, relating to this ACTION that are not equally accessible to the Defendant in this
9 ACTION.

10 **REQUEST FOR PRODUCTION NO. 4:**

11 All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third
12 parties, on the other hand, CONCERNING actual or potential claims in connection with OTHER
13 GENERATIVE AI LITIGATION, including but not limited to interviews, statements to the press, and
14 discussions with other authors not a party to the ACTION.

15 **RESPONSE TO REQUEST NO. 4:**

16 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
17 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
18 Request to the extent that the term “actual or potential claims in connection with OTHER
19 GENERATIVE AI LITIGATION,” is overbroad and ambiguous. Plaintiff further objects to this
20 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
21 of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to
22 this Request to the extent that it calls for documents subject to the attorney-client privilege, work
23 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects
24 to this Request to the extent that it is duplicative, in whole or in part, of Request for Production
25 Nos. 2, 3.

26 Subject to and without waiving the general and specific objections stated above, Plaintiff will
27 search for and produce relevant and responsive non-privileged communications within her possession,
28

1 custody, or control regarding Plaintiff's decision to be named Plaintiff in this Action that are not equally
2 accessible to the Defendant in this ACTION.

3 **REQUEST FOR PRODUCTION NO. 5:**

4 All COMMUNICATIONS including YOU or individuals acting on YOUR behalf, relating to
5 the ACTION, OTHER GENERATIVE AI LITIGATION or generative AI tools.

6 **RESPONSE TO REQUEST NO. 5:**

7 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
8 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to the
9 phrase "individuals acting on YOUR behalf" as vague and ambiguous. Plaintiff will only search for
10 relevant material in his care, custody, or control. Plaintiff objects to this Request to the extent that the
11 term "generative AI tools" is vague and ambiguous. Plaintiff further objects to this Request as unduly
12 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,
13 particularly because the Request seeks "All COMMUNICATIONS." Plaintiff objects to this Request
14 to the extent that it calls for communications subject to the attorney-client privilege, work product
15 doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this
16 Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, 4.

17 Subject to and without waiving the general and specific objections stated above, Plaintiff
18 responds OTHER GENERATIVE AI LITIGATION is not relevant to this ACTION and Plaintiff will
19 meet and confer to narrow the scope of the Request.

20 **REQUEST FOR PRODUCTION NO. 6:**

21 All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about
22 generative AI.

23 **RESPONSE TO REQUEST NO. 6:**

24 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
25 Request to the extent that it is vague, ambiguous, and overbroad in nature with respect the terms
26 "statements, opinions, and/or views." Plaintiff objects to this Request to the extent that the term
27 "generative AI" is vague and ambiguous. Plaintiff further objects to this Request as unduly
28 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,

RESPONSE TO REQUEST NO. 20:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “YOU first became aware of” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production No. 19.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged documents within her possession, custody, or control relating to when and how Plaintiff first became aware of the alleged infringement of Plaintiff’s ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language models if they exist.

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS CONCERNING the Discord chats and other COMMUNICATIONS referenced in Paragraphs 55-62 of the First Consolidated Amended Complaint, including all referenced COMMUNICATIONS, DOCUMENTS REFLECTING when and how YOU obtained such COMMUNICATIONS, YOUR efforts to obtain such COMMUNICATIONS, and from whom YOU obtained such COMMUNICATIONS.

RESPONSE TO REQUEST NO. 21:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “obtained” is vague. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request on the grounds that some such documents are publicly accessible, are equally available to Defendant, or are

1 already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls
 2 for documents subject to the attorney-client privilege, work product doctrine, and/or any other
 3 applicable privilege or protection from disclosure.

4 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 5 produce, upon receipt from EleutherAI, the Discord chat messages referenced in paragraphs 55–62 of
 6 the First Consolidated Amended Complaint.

7 **REQUEST FOR PRODUCTION NO. 22:**

8 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those on YOUR behalf, to
 9 enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who
 10 has allegedly infringed YOUR ASSERTED WORKS.

11 **RESPONSE TO REQUEST NO. 22:**

12 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
 13 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 14 Request to the extent that the term “efforts” is vague and ambiguous. Plaintiff objects to this Request to
 15 the extent that the term “YOUR behalf” is ambiguous and overbroad. Plaintiff further objects to this
 16 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
 17 of the case. Plaintiff objects to this Request on the grounds that some such documents are publicly
 18 accessible, are equally available to Defendant, or are already in their possession, custody, or control.
 19 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
 20 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

21 Subject to and without waiving the general and specific objections stated above, Plaintiff refers
 22 the propounding party to *In Re OpenAI ChatGPT Litigation*, Lead Case No. 3:23-cv-03223-AMO.

23 **REQUEST FOR PRODUCTION NO. 23:**

24 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
 25 Meta’s alleged infringement of YOUR ASSERTED WORKS.

26 **RESPONSE TO REQUEST NO. 23:**

27 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
 28 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF RACHEL LOUISE SNYDER'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

RESPONSE TO REQUEST NO. 2:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that some such communications are publicly accessible, are equally available to Defendants, or are already in the possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request For Production No. 3.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged communications within her possession, custody, or control relating to this ACTION that are not equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 3:

All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING actual or potential claims against Meta, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 3:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request to the extent that the term “actual or potential claims against Meta” is overbroad and overly burdensome. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for

1 communications subject to the attorney-client privilege, work product doctrine, and/or any other
2 applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that
3 some such documents are publicly accessible, are equally available to Defendants, or are already in
4 their possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative,
5 in whole or in part, of Request For Production No. 2.

6 Subject to and without waiving the general and specific objections stated above, Plaintiff will
7 search for and produce relevant and responsive non-privileged communications within her possession,
8 custody, or control, relating to this ACTION that are not equally accessible to the Defendants in this
9 ACTION.

10 **REQUEST FOR PRODUCTION NO. 4:**

11 All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third
12 parties, on the other hand, CONCERNING actual or potential claims in connection with OTHER
13 GENERATIVE AI LITIGATION, including but not limited to interviews, statements to the press, and
14 discussions with other authors not a party to the ACTION.

15 **RESPONSE TO REQUEST NO. 4:**

16 In addition to and without waiving the general objections set forth above, Plaintiff objects to
17 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
18 Request to the extent that the term “actual or potential claims in connection with OTHER
19 GENERATIVE AI LITIGATION,” is overbroad and ambiguous. Plaintiff further objects to this
20 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
21 of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to
22 this Request to the extent that it calls for documents subject to the attorney-client privilege, work
23 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to
24 this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3.

25 Subject to and without waiving the general and specific objections stated above, Plaintiff will
26 search for and produce relevant and responsive non-privileged communications within her possession,
27 custody, or control regarding Plaintiff’s decision to be named Plaintiff in this Action that are not
28 equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 5:

All COMMUNICATIONS including YOU or individuals acting on YOUR behalf, relating to the ACTION, OTHER GENERATIVE AI LITIGATION or generative AI tools.

RESPONSE TO REQUEST NO. 5:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to the phrase “individuals acting on YOUR behalf” as vague and ambiguous. Plaintiff will only search for relevant material in his care, custody, or control. Plaintiff objects to this Request to the extent that the term “generative AI tools” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff responds OTHER GENERATIVE AI LITIGATION is not relevant to this ACTION and Plaintiff will meet and confer to narrow the scope of the Request.

REQUEST FOR PRODUCTION NO. 6:

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about generative AI.

RESPONSE TO REQUEST NO. 6:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature with respect the terms “statements, opinions, and/or views.” Plaintiff objects to this Request to the extent that the term “generative AI” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product

1 Request to the extent that the term “YOU first became aware of” is vague and ambiguous. Plaintiff
2 further objects to this Request as unduly burdensome, not relevant to any claim or defense, and
3 disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.”
4 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
5 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.
6 Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request For
7 Production No. 19.

8 Subject to and without waiving the general and specific objections stated above, Plaintiff will
9 search for and produce relevant and responsive non-privileged documents within her possession,
10 custody, or control relating to when and how Plaintiff first became aware of the alleged infringement of
11 Plaintiff’s ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language
12 models if they exist.

13 **REQUEST FOR PRODUCTION NO. 21:**

14 All DOCUMENTS CONCERNING the Discord chats and other COMMUNICATIONS
15 referenced in Paragraphs 55-62 of the First Consolidated Amended Complaint, including all referenced
16 COMMUNICATIONS, DOCUMENTS REFLECTING when and how YOU obtained such
17 COMMUNICATIONS, YOUR efforts to obtain such COMMUNICATIONS, and from whom YOU
18 obtained such COMMUNICATIONS.

19 **RESPONSE TO REQUEST NO. 21:**

20 In addition to and without waiving the general objections set forth above, Plaintiff objects to
21 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
22 Request to the extent that the term “obtained” is vague. Plaintiff further objects to this Request as
23 unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,
24 particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request on the
25 grounds that some such documents are publicly accessible, are equally available to Defendants, or are
26 already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls
27 for documents subject to the attorney-client privilege, work product doctrine, and/or any other
28 applicable privilege or protection from disclosure.

1 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 2 produce, upon receipt from EleutherAI, the Discord chat messages referenced in paragraphs 55–62 of
 3 the First Consolidated Amended Complaint.

4 **REQUEST FOR PRODUCTION NO. 22:**

5 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those on YOUR behalf, to
 6 enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who
 7 has allegedly infringed YOUR ASSERTED WORKS.

8 **RESPONSE TO REQUEST NO. 22:**

9 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 10 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 11 Request to the extent that the term “efforts” is vague and ambiguous. Plaintiff objects to this Request to
 12 the extent that the term “YOUR behalf” is ambiguous and overbroad. Plaintiff further objects to this
 13 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
 14 of the case. Plaintiff objects to this Request on the grounds that some such documents are publicly
 15 accessible, are equally available to Defendants, or are already in their possession, custody, or control.
 16 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
 17 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

18 Subject to and without waiving the general and specific objections stated above, Plaintiff refers
 19 the propounding party to *In Re OpenAI ChatGPT Litigation*, Lead Case No. 3:23-cv-03223-AMO.

20 **REQUEST FOR PRODUCTION NO. 23:**

21 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
 22 Meta’s alleged infringement of YOUR ASSERTED WORKS.

23 **RESPONSE TO REQUEST NO. 23:**

24 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 25 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 26 Request to the extent that the term “sustained injury” is vague. Plaintiff further objects to this Request
 27 as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
 28 case, particularly because the Request seeks “All DOCUMENTS.” Plaintiffs also object to the Request

David A. Straite (admitted *pro hac vice*)

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*Counsel for Plaintiffs and the Proposed
Class, Additional Counsel Listed Below*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RICHARD KADREY, SARAH SILVERMAN,
CHRISTOPHER GOLDEN, TA-NEHISI
COATES, JUNOT DÍAZ, ANDREW SEAN
GREER, DAVID HENRY HWANG,
MATTHEW KLAM, LAURA LIPPMAN,
RACHEL LOUISE SNYDER, JACQUELINE
WOODSON, AND LYSA TERKEURST,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.;

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFF LYSA TERKEURST'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION**

PROPOUNDING PARTY: Defendant Meta Platforms, Inc.

RESPONDING PARTY: Lysa TerKeurst

SET NUMBER: One (1)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Lysa TerKeurst ("Plaintiff") in the above-titled action hereby responds to Defendant Meta Platforms, Inc. ("Defendant" or "Meta") First Set of Requests for Production of Documents (the "Requests"). An agreement by Plaintiff to search for documents does not mean that she has documents in her possession, custody, or control.

REQUEST FOR PRODUCTION NO. 2:

All COMMUNICATIONS between YOU, on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING the ACTION, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 2:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that some such communications are publicly accessible, are equally available to Defendants, or are already in the possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production No. 3.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged communications within her possession, custody, or control relating to this ACTION that are not equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 3:

All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING actual or potential claims against Meta, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 3:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request to the extent that the term “actual or potential claims against Meta” is overbroad and overly burdensome. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that some such documents are publicly accessible, are equally available to Defendants, or are already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production No. 2.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged communications within her possession, custody, or control, relating to this ACTION that are not equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 4:

All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING actual or potential claims in connection with OTHER GENERATIVE AI LITIGATION, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 4:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “actual or potential claims in connection with OTHER

1 GENERATIVE AI LITIGATION,” is overbroad and ambiguous. Plaintiff further objects to this
2 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
3 needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff
4 objects to this Request to the extent that it calls for documents subject to the attorney-client
5 privilege, work product doctrine, and/or any other applicable privilege or protection from
6 disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part,
7 of Request for Production Nos. 2, 3.

8 Subject to and without waiving the general and specific objections stated above, Plaintiff
9 will search for and produce relevant and responsive non-privileged communications within her
10 possession, custody, or control that are not equally accessible to the Defendants in this ACTION.

11 **REQUEST FOR PRODUCTION NO. 5:**

12 All COMMUNICATIONS including YOU or individuals acting on YOUR behalf, relating
13 to the ACTION, OTHER GENERATIVE AI LITIGATION or generative AI tools.

14 **RESPONSE TO REQUEST NO. 5:**

15 In addition to and without waiving the general objections set forth above, Plaintiff objects
16 to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects
17 to the phrase “individuals acting on YOUR behalf” as vague and ambiguous. Plaintiff will only
18 search for relevant material in her care, custody, or control. Plaintiff objects to this Request to the
19 extent that the term “generative AI tools” is vague and ambiguous. Plaintiff further objects to this
20 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
21 needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff
22 objects to this Request to the extent that it calls for communications subject to the attorney-client
23 privilege, work product doctrine, and/or any other applicable privilege or protection from
24 disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part,
25 of Request for Production Nos. 2, 3, 4.

1 Subject to and without waiving the general and specific objections stated above, Plaintiff
2 responds OTHER GENERATIVE AI LITIGATION is not relevant to this ACTION and Plaintiff
3 will meet and confer to narrow the scope of the Request. Plaintiff will produce

4 **REQUEST FOR PRODUCTION NO. 6:**

5 All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about
6 generative AI.

7 **RESPONSE TO REQUEST NO. 6:**

8 In addition to and without waiving the general objections set forth above, Plaintiff objects
9 to this Request to the extent that it is vague, ambiguous, and overbroad in nature with respect to
10 the terms “statements, opinions, and/or views.” Plaintiff objects to this Request to the extent that
11 the term “generative AI” is vague and ambiguous. Plaintiff further objects to this Request as unduly
12 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,
13 particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this
14 Request to the extent that it calls for communications subject to the attorney-client privilege, work
15 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff
16 objects to this Request to the extent that it is duplicative, in whole or in part, of Request for
17 Production Nos. 2, 3, 4, 5.

18 Subject to and without waiving the general and specific objections stated above, Plaintiff
19 will produce responsive communications from Plaintiff, Lysa TerKeurst, whether communicated
20 individually by her, or communicated by one of her employees, agents, or representatives at her
21 direction.

22 **REQUEST FOR PRODUCTION NO. 7:**

23 All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about
24 Meta.

25 **RESPONSE TO REQUEST NO. 7:**

DOCUMENTS.” Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production No. 19.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged documents within her possession, custody, or control relating to when and how Plaintiff first became aware of the alleged infringement of Plaintiff’s ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language models if they exist.

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS CONCERNING the Discord chats and other COMMUNICATIONS referenced in Paragraphs 55-62 of the First Consolidated Amended Complaint, including all referenced COMMUNICATIONS, DOCUMENTS REFLECTING when and how YOU obtained such COMMUNICATIONS, YOUR efforts to obtain such COMMUNICATIONS, and from whom YOU obtained such COMMUNICATIONS.

RESPONSE TO REQUEST NO. 21:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “obtained” is vague. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request on the grounds that some such documents are publicly accessible, are equally available to Defendants, or are already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

1 Subject to and without waiving the general and specific objections stated above, Plaintiff
2 will search for and produce relevant and responsive non-privileged documents within her
3 possession, custody, or control.

4 **REQUEST FOR PRODUCTION NO. 22:**

5 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those on YOUR behalf,
6 to enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone
7 who has allegedly infringed YOUR ASSERTED WORKS.

8 **RESPONSE TO REQUEST NO. 22:**

9 In addition to and without waiving the general objections set forth above, Plaintiff objects
10 to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects
11 to this Request to the extent that the term “efforts” is vague and ambiguous. Plaintiff objects to
12 this Request to the extent that the term "YOUR behalf" is ambiguous and overbroad. Plaintiff
13 further objects to this Request as unduly burdensome, not relevant to any claim or defense, and
14 disproportionate to the needs of the case. Plaintiff objects to this Request on the grounds that some
15 such documents are publicly accessible, are equally available to Defendants, or are already in their
16 possession, custody, or control. Plaintiff objects to this Request to the extent that it calls for
17 documents subject to the attorney-client privilege, work product doctrine, and/or any other
18 applicable privilege or protection from disclosure.

19 Subject to and without waiving the general and specific objections stated above, Plaintiff
20 will search for and produce relevant and responsive non-privileged documents within her
21 possession, custody, or control.

22 **REQUEST FOR PRODUCTION NO. 23:**

23 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
24 Meta’s alleged infringement of YOUR ASSERTED WORKS.

25 **RESPONSE TO REQUEST NO. 23:**

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Travis Manfredi (State Bar No. 281779)
Holden Benon (State Bar No. 325847)
Kathleen J. McMahon (State Bar No. 340007)
Aaron Cera (State Bar No. 351163)

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF JACQUELINE WOODSON'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

RESPONSE TO REQUEST NO. 2:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that some such communications are publicly accessible, are equally available to Defendants, or are already in the possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request For Production No. 3.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged communications within her possession, custody, or control relating to this ACTION that are not equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 3:

All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third parties, on the other hand, CONCERNING actual or potential claims against Meta, including but not limited to interviews, statements to the press, and discussions with other authors not a party to the ACTION.

RESPONSE TO REQUEST NO. 3:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “authors” is vague and ambiguous. Plaintiff objects to this Request to the extent that the term “actual or potential claims against Meta” is overbroad and overly burdensome. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff further objects to this Request to the extent that it calls for

1 communications subject to the attorney-client privilege, work product doctrine, and/or any other
2 applicable privilege or protection from disclosure. Plaintiff objects to this Request on the grounds that
3 some such documents are publicly accessible, are equally available to Defendants, or are already in
4 their possession, custody, or control. Plaintiff objects to this Request to the extent that it is duplicative,
5 in whole or in part, of Request For Production No. 2.

6 Subject to and without waiving the general and specific objections stated above, Plaintiff will
7 search for and produce relevant and responsive non-privileged communications within her possession,
8 custody, or control, relating to this ACTION that are not equally accessible to the Defendants in this
9 ACTION.

10 **REQUEST FOR PRODUCTION NO. 4:**

11 All COMMUNICATIONS between YOU on the one hand, and the other Plaintiffs or third
12 parties, on the other hand, CONCERNING actual or potential claims in connection with OTHER
13 GENERATIVE AI LITIGATION, including but not limited to interviews, statements to the press, and
14 discussions with other authors not a party to the ACTION.

15 **RESPONSE TO REQUEST NO. 4:**

16 In addition to and without waiving the general objections set forth above, Plaintiff objects to
17 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
18 Request to the extent that the term “actual or potential claims in connection with OTHER
19 GENERATIVE AI LITIGATION,” is overbroad and ambiguous. Plaintiff further objects to this
20 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
21 of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to
22 this Request to the extent that it calls for documents subject to the attorney-client privilege, work
23 product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to
24 this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3.

25 Subject to and without waiving the general and specific objections stated above, Plaintiff will
26 search for and produce relevant and responsive non-privileged communications within her possession,
27 custody, or control regarding Plaintiff’s decision to be named Plaintiff in this Action that are not
28 equally accessible to the Defendants in this ACTION.

REQUEST FOR PRODUCTION NO. 5:

All COMMUNICATIONS including YOU or individuals acting on YOUR behalf, relating to the ACTION, OTHER GENERATIVE AI LITIGATION or generative AI tools.

RESPONSE TO REQUEST NO. 5:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to the phrase “individuals acting on YOUR behalf” as vague and ambiguous. Plaintiff will only search for relevant material in his care, custody, or control. Plaintiff objects to this Request to the extent that the term “generative AI tools” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff responds OTHER GENERATIVE AI LITIGATION is not relevant to this ACTION and Plaintiff will meet and confer to narrow the scope of the Request.

REQUEST FOR PRODUCTION NO. 6:

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about generative AI.

RESPONSE TO REQUEST NO. 6:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature with respect the terms “statements, opinions, and/or views.” Plaintiff objects to this Request to the extent that the term “generative AI” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All COMMUNICATIONS.” Plaintiff objects to this Request to the extent that it calls for communications subject to the attorney-client privilege, work product

Request to the extent that the term “YOU first became aware of” is vague and ambiguous. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request For Production No. 19.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive non-privileged documents within her possession, custody, or control relating to when and how Plaintiff first became aware of the alleged infringement of Plaintiff’s ASSERTED WORKS by THIRD PARTY generative AI tools, platforms, or large language models if they exist.

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS CONCERNING the Discord chats and other COMMUNICATIONS referenced in Paragraphs 55-62 of the First Consolidated Amended Complaint, including all referenced COMMUNICATIONS, DOCUMENTS REFLECTING when and how YOU obtained such COMMUNICATIONS, YOUR efforts to obtain such COMMUNICATIONS, and from whom YOU obtained such COMMUNICATIONS.

RESPONSE TO REQUEST NO. 21:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request to the extent that the term “obtained” is vague. Plaintiff further objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All DOCUMENTS.” Plaintiff objects to this Request on the grounds that some such documents are publicly accessible, are equally available to Defendants, or are already in their possession, custody, or control. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

1 Subject to and without waiving the general and specific objections stated above, Plaintiff will
 2 produce, upon receipt from EleutherAI, the Discord chat messages referenced in paragraphs 55–62 of
 3 the First Consolidated Amended Complaint.

4 **REQUEST FOR PRODUCTION NO. 22:**

5 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those on YOUR behalf, to
 6 enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who
 7 has allegedly infringed YOUR ASSERTED WORKS.

8 **RESPONSE TO REQUEST NO. 22:**

9 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 10 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 11 Request to the extent that the term “efforts” is vague and ambiguous. Plaintiff objects to this Request to
 12 the extent that the term “YOUR behalf” is ambiguous and overbroad. Plaintiff further objects to this
 13 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
 14 of the case. Plaintiff objects to this Request on the grounds that some such documents are publicly
 15 accessible, are equally available to Defendants, or are already in their possession, custody, or control.
 16 Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client
 17 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

18 Subject to and without waiving the general and specific objections stated above, Plaintiff refers
 19 the propounding party to *In Re OpenAI ChatGPT Litigation*, Lead Case No. 3:23-cv-03223-AMO.

20 **REQUEST FOR PRODUCTION NO. 23:**

21 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
 22 Meta’s alleged infringement of YOUR ASSERTED WORKS.

23 **RESPONSE TO REQUEST NO. 23:**

24 In addition to and without waiving the general objections set forth above, Plaintiff objects to
 25 this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 26 Request to the extent that the term “sustained injury” is vague. Plaintiff further objects to this Request
 27 as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
 28 case, particularly because the Request seeks “All DOCUMENTS.” Plaintiffs also object to the Request